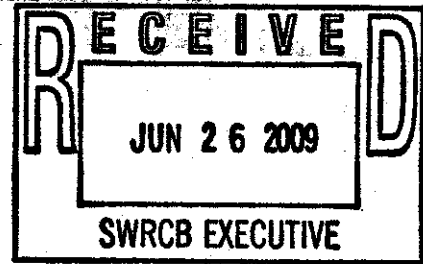


STANFORD
UNIVERSITY



June 26, 2009

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Landscape Irrigation Uses of Municipal Recycled Water – Draft General Permit and Initial Study

Dear Ms. Townsend:

Stanford University would like to reiterate its prior written and oral comments on the State Water Board's proposed General Permit and CEQA Initial Study for landscape irrigation uses of recycled water. Unfortunately, the revised General Permit and Initial Study do not address the serious issues raised by Stanford concerning the deleterious effects on salt-sensitive plantings such as redwood trees caused by the use of high-salinity irrigation water. Moreover, because these deleterious effects may very well be irreversible, after-the-fact monitoring and reporting on salinity levels fails to provide adequate protection for trees and plants.

The Initial Study should therefore be revised to provide an adequate environmental analysis of the adverse salinity impacts caused by the increased use of recycled water for irrigation. Further, for sites where salt-sensitive plantings are present, the General Permit should be revised to require a rigorous site-specific analysis – *before* recycled water is applied – and a science-based showing that, given the plant species at issue and the prevailing soil conditions, salinity levels in the recycled water will not cause significant adverse effects to salt-sensitive plantings.

Stanford supports beneficial uses of recycled water, but significant impacts to redwoods and other species – which form a vital part of the landscape in the South Bay Area and in many other places in California – must be avoided. We appreciate the Board's further consideration of Stanford's comments before final adoption of the General Permit and Initial Study.

Sincerely yours,

William T. Phillips/gz

William T. Phillips
Senior Associate Vice President
Land, Buildings and Real Estate

Jim Inglis

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Director of Design & Construction

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